

EXHIBIT 18

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
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4

5 IN RE: TERRORIST ATTACKS : 03-MDL-1570
6 ON SEPTEMBER 11, 2001 : (GBD) (SN)
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10 JULY 1, 2021
11 THIS TRANSCRIPT CONTAINS
12 CONFIDENTIAL MATERIAL
13 - - -
14

15 Remote Videotaped
16 Deposition, taken via Zoom, of MARC
17 SAGEMAN, M.D., Ph.D., commencing at 9:08
18 a.m., on the above date, before Amanda
19 Maslynsky-Miller, Certified Realtime
20 Reporter and Notary Public in and for the
21 Commonwealth of Pennsylvania.
22
23

24 - - -
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I N D E X
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5 Testimony of: MARC SAGEMAN, M.D., Ph.D.

6 By Mr. Haefele 12

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2 DEPOSITION SUPPORT INDEX

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1 - - -
2 (It is hereby stipulated and
3 agreed by and among counsel that
4 sealing, filing and certification
5 are waived; and that all
6 objections, except as to the form
7 of the question, will be reserved
8 until the time of trial.)

9 - - -
10 VIDEO TECHNICIAN: We are
11 now on the record. My name is
12 David Lane, videographer for
13 Golkow Litigation Services.
14 Today's date is July 1st, 2021.
15 Our time on the record is 9:08
16 a.m. Eastern Standard Time.

17 This remote video deposition
18 is being held in the matter of the
19 Terrorist Attacks on September
20 11th, 2001. Our deponent today is
21 Dr. Marc Sageman.

22 All parties to this
23 deposition are appearing remotely
24 and have agreed to the witness

1 being sworn in remotely.

2 Due to the nature of remote
3 reporting, please pause briefly
4 before speaking so that all
5 parties are heard completely.

6 Our counsel will be noted on
7 the stenographic record. Our
8 court reporter today is Amanda
9 Miller, who will now swear in our
10 witness.

11 - - -

12 MARC SAGEMAN, after having
13 been duly sworn, was examined and
14 testified as follows:

15 - - -

16 VIDEO TECHNICIAN: Please
17 begin.

18 - - -

19 EXAMINATION

20 - - -

21 BY MR. HAEFELE:

22 Q. Good morning, Dr. Sageman.
23 Just for the record, can you tell us what
24 your full name is, please?

1 A. It's Marc S. Sageman.

2 Q. Thank you.

3 And my name -- I think
4 you've already heard, my name is Robert
5 Haefele. I'm an attorney with the law
6 firm of Motley Rice. I'm down in South
7 Carolina. Together I, with a number of
8 other lawyers that are present mostly on
9 the Zoom deposition and elsewhere,
10 represent plaintiffs in litigation
11 pending in the federal court in the
12 Southern District of New York.

13 The case is brought on
14 behalf of family members who lost loved
15 ones in the September 11th attacks and
16 the survivors of those attacks and
17 commercial parties that incurred
18 financial losses as a result of the
19 attacks.

20 I think you understand that,
21 don't you?

22 A. Yes, I do.

23 Q. All right. And I believe
24 that you also know that one of the

1 defendants in the litigation is an entity
2 known as the World Assembly of Muslim
3 Youth, or WAMY, which the 9/11 families
4 and other plaintiffs allege engaged in
5 material support to al-Qaeda leading into
6 the 9/11 attacks.

7 You understand those to be
8 the allegations against WAMY, right?

9 A. Yes, I do.

10 Q. Okay. And you are someone
11 who that defendant, WAMY, the World
12 Assembly of Muslim Youth, has retained as
13 a purported expert to offer your opinions
14 in support of WAMY's defense in
15 litigation; is that right?

16 A. Yes.

17 Q. All right.

18 MR. HAEFELE: And just so
19 that we have it in the deposition
20 record, I'm going to ask that we
21 mark as the next exhibit, which I
22 think in this litigation is
23 Exhibit-854, and that's the notice
24 of deposition of Marc Sageman.

1

- - -

2 (Whereupon, Exhibit

3 Sageman-854, No Bates, Notice of
4 Oral Deposition of Marc Sageman,
5 M.D., Ph.D., was marked for
6 identification.)

7

- - -

8 BY MR. HAEFELE:

9 Q. And are you the person
10 that's identified in that notice?

11 A. May I stop you here? I
12 don't really receive the exhibit on the
13 right screen, and I would like to take --

14 MR. HAEFELE: Sure. Take a
15 moment and adjust it. It should
16 be the primary screen that
17 you're -- that you have up. It
18 should be the -- normally when I'm
19 speaking, I'll be on the screen.

20 And then the tech puts it up on
21 the screen in place of my face,
22 which is probably a nice relief.

23 But you should have it on
24 your main screen.

1 June, and they have not paid that.

2 Q. I'm confident that they
3 will.

4 Do you recall being a
5 defendant in a case in around 1993 by --
6 the plaintiff being someone named Carol
7 Black versus the University of
8 Pennsylvania, and your name was
9 associated as a defendant, too, I think?

10 A. No, I don't remember.

11 Q. You don't remember that?

12 A. No. In those cases, a lot
13 of patients sue anybody who was on the
14 staff. And I'm not even sure that I was
15 even, you know, notified.

16 Q. On your C.V., I don't see a
17 listing or a reference to an entity
18 called Sageman Consulting, LLC.

19 You had an entity that you
20 worked with or through known as Sageman
21 Consulting, LLC, right?

22 A. Yes, I did.

23 Q. And why isn't it listed on
24 your C.V. in any manner?

1 A. I think we dissolved it.

2 Look, all the administrative
3 stuff of my practice has always been done
4 by my wife. And it's easy for me to
5 blame my wife on all of this, but she
6 does all of that.

7 So I'm not -- she kind of
8 looked at the tax benefit, or whatever,
9 of having an LLC or us being -- I don't
10 know. I'm -- kind of being a physician,
11 I'm an entity and, you know, bill myself
12 for -- whatever.

13 This is something that
14 totally uninterests me, so I don't know
15 anything about that.

16 But, yes, in the past, I did
17 have an LLC. I was an LLC.

18 Q. Okay. Incidentally, does
19 your wife read the transcripts of the
20 testimony that you give?

21 A. No. And I will insist she
22 does not.

23 Q. Because as I understand,
24 this is not the first time you've thrown

1 her under the bus, is it?

2 MR. GOETZ: Objection.

3 Form.

4 THE WITNESS: I do that on a
5 regular basis. That's the basis
6 of a good marriage.

7 BY MR. HAEFELE:

8 Q. So she's used to that now,
9 right?

10 A. It's the basis of a good
11 marriage, as I said.

12 Q. Do you know, was Sageman
13 Consulting, LLC, dissolved in or about
14 2005?

15 A. No, that I don't know. I
16 can't really -- I wouldn't be able to
17 tell you. She's the one to ask.

18 Q. All right. And did you or
19 Sageman Consulting employ staff, other
20 than you and your wife, or was it just
21 you and your wife?

22 A. No, I don't know. Sometimes
23 people came in and -- you know, students
24 doing internships with me. I don't know

1 whether they were part of it or -- I
2 don't know. I don't take care of the
3 administrative part of my practice.

4 Q. Why did the entity get
5 dissolved?

6 A. I think that it was more
7 advantageous -- is there such a thing as
8 a corporation S?

9 Q. There is something called an
10 S corporation.

11 A. An S corporation, sorry.

12 I think there were more
13 advantages for me to be an S corporation,
14 she told me, than being an LLC. And, you
15 know, I trust my wife. And I don't even
16 know the difference between them.

17 Q. Is there something now
18 called Sageman Consulting, Inc. or
19 Company or Corp?

20 A. I don't think so. I think
21 I'm just Marc Sageman.

22 Q. So is there something now
23 called Marc Sageman, Ph.D., M.D.?

24 A. No, no. M.D., Ph.D. Marc

Was your work with each of
these governments essentially the same
kind of work that you were doing but you
were doing it with each of the different
governments?

6 A. No. It depended what they
7 were interested in. And so they would
8 invite me for a little period of time,
9 and we would discuss the situation there
10 and how to improve it.

11 Q. And was it related to issues
12 of insider threats to those countries?

13 A. No. It was usually
14 terrorism -- terrorism financing. No.
15 The insider threat was only for the U.S.
16 government.

17 Q. Okay.

18 A. Kenya. Sorry. Kenya.

19 Q. I can.

20 A. Cute.

21 Q. It depends on what you want
22 me to do.

23 So you started with the CIA
24 in '84, correct?

1 A. Yes.

2 Q. And I take it you did some
3 training with the CIA to become -- for
4 the position you took at the CIA?

5 A. Yes, a case officer. Yes,
6 for one year.

7 Q. And that training was, they
8 had a facility called The Farm, I think
9 they call it?

10 A. Yes.

11 Q. And that was a year-long
12 training.

13 What sort of training -- if
14 you're allowed to tell me anything about
15 it, what sort of training did they train
16 you to do?

17 A. There are -- there are two
18 large aspects. One is paramilitary
19 training for about three, four months.
20 And then a much longer course of five,
21 six months on developing intelligence and
22 handling assets, intelligence assets.

23 Q. And do they tell you how to,
24 for example, extract information from

1 assets?

2 MR. GOETZ: Objection to
3 form.

4 THE WITNESS: Yes. They do
5 go over not only the debriefing,
6 the format of the debrief, but
7 also how to write it up, yes.

8 BY MR. HAEFELE:

9 Q. Do they tell you how to --
10 as part of getting the information from
11 assets or other folks in the field, is
12 there any element of that that relates to
13 using deception to get information?

14 A. You could use deception.
15 But usually people are pretty
16 straightforward.

17 Q. Does the -- as part of your
18 training, do they teach you how to
19 deceive people to get information?

20 MR. GOETZ: Objection.
21 Form.

22 THE WITNESS: Again,
23 usually, you don't really get that
24 great information through

1 deception. So people, as I said,
2 are usually pretty
3 straightforward. And once you
4 have a recruited asset, he
5 actually wholeheartedly cooperates
6 and collaborates with you.

7 BY MR. HAEFELE:

8 Q. As part of your training,
9 does the CIA tell you how to lie to
10 people to get information?

11 A. Usually they teach you to
12 try to avoid it. You just don't talk
13 about what you don't want them to know.
14 So you don't really straightforward lie
15 to them, just avoid the topic in a sense.

16 Q. And is one of the ways that
17 you do that, for example, when somebody
18 asks you a question, you redirect the
19 answer in a different direction?

20 A. That could be, yes.

21 Q. Kind of like what you just
22 did?

23 A. No. I answered your
24 question.

1 I don't know if you're
2 satisfied with it, but I think I
3 answered.

4 MR. GOETZ: Just a heads-up,
5 we have lunch coming in about five
6 minutes.

7 MR. HAEFELE: All right.

8 BY MR. HAEFELE:

9 Q. Initially --

10 MR. GOETZ: Actually, our
11 lunch is here. So any time you
12 want to take a break.

13 MR. HAEFELE: Pardon me?

14 MR. GOETZ: I'm sorry. I
15 guess our lunch is here. So any
16 time you want to take a break,
17 it's fine.

18 MR. HAEFELE: We can break
19 now.

20 THE WITNESS: Well, good,
21 because I was about to kill you.
22 There are things that I cannot
23 tell you and I would have to kill
24 you before I tell you.

1 MR. HAEFELE: All right. We
2 didn't get there.

3 THE WITNESS: No.

4 MR. GOETZ: How long do you
5 want to take?

6 MR. HAEFELE: How long do
7 you need?

8 MR. GOETZ: Half hour.

9 MR. HAEFELE: We should be
10 able to take a half hour.

11 MR. GOETZ: Forty-five
12 minutes my team wants.

13 MR. HAEFELE: Okay.

14 Forty-five minutes. So it is
15 12:26 -- 12:30. So if we come
16 back ten after 1:00-ish.

17 MR. GOETZ: Perfect.

18 VIDEO TECHNICIAN: We're
19 going to go off the record. The
20 time is 12:27 p.m.

21 - - -

22 (Whereupon, a luncheon
23 recess was taken.)

24 - - -

1 I'm sorry. Is it related to
2 testifying -- well, is most of your
3 current income related to testifying in
4 terrorism-related cases?

5 A. Most of my income in the
6 last year, year and-a-half, is from my
7 legal work, yes.

8 Q. And it's legal work in
9 terrorism consulting cases, correct?

10 A. Yes.

11 Q. And how long has that been
12 the case?

13 A. About five years, perhaps.

14 Q. And what percentage of your
15 income comes from your litigation-related
16 terrorism consulting work?

17 A. As I said, right now it's
18 most of my income. It's all -- because
19 I'm retiring, and so I'm closing down
20 everything else. And that's the last few
21 things lingering.

22 Q. And what percentage of your
23 annual income from terrorist-related
24 cases versus income from

1 non-terrorism-related cases?

2 A. In the last two years, about
3 95 percent.

4 Q. Now, Dr. Sageman, is it true
5 that you have referred to yourself as
6 doing James Bond stuff?

7 A. Maybe in jest. I don't
8 recall.

9 Q. Have you ever referred to
10 yourself as a spymaster during expert
11 testimony?

12 A. I don't recall as we sit
13 here. You have to show me.

14 Q. Okay.

15 MR. HAEFELE: Can we maybe
16 put up the next exhibit? What's
17 the next exhibit number?

18 COURT REPORTER: 859.

19 MR. HAEFELE: Jon, are you
20 there? Can we put up Number 6A.

21 - - -

22 (Whereupon, Exhibit
23 Sageman-859, No Bates, Reporter's
24 Transcript, Jury Trial, Day 21,

1 was marked for identification.)

2 - - -

3 BY MR. HAEFELE:

4 Q. This is your testimony in
5 the U.S. versus Jumaev case that we
6 referenced a moment ago from April 24,
7 2018.

8 Do you remember testifying
9 there?

10 A. Yes, I do.

11 MR. HAEFELE: Can we go to
12 Page 24 of the PDF and look at
13 Lines 11 to 15?

14 BY MR. HAEFELE:

15 Q. This says, I was a case
16 officer for the Central Intelligence
17 Agency.

18 Question: What does a case
19 officer mean?

20 Answer: The case officer, I
21 guess, is you're a spymaster. You are
22 the one that actually handles the other
23 country's spies, or you handle
24 commanders, insurgency. You're basically

1 James Bond.

2 Do you remember that
3 testimony?

4 A. What page is it on?

5 Q. It's right in front of you
6 on the screen.

7 A. I'm trying to get the big
8 screen, not the small screen.

9 Q. Well, all right. It's on --
10 if you're looking at the PDF, Page 24.

11 MR. HAEFELE: Jon, you can
12 take away the blowup if that helps
13 him find it. Maybe he can find it
14 on the big screen by looking at
15 the full page.

16 Page 2075 of the court
17 transcript, but it's on Page 24 of
18 96.

19 BY MR. HAEFELE:

20 Q. Dr. Sageman, you can see the
21 full page. So you can see the context in
22 front of you.

23 A. Yeah, I'm looking at --

24 Q. And it's simple.

1 The question is, did you
2 refer to yourself as a spy master doing
3 James Bond stuff?

4 A. Not myself. I tried to
5 explain what the case officer is. And if
6 you look at the quote itself, it says,
7 the case officer, I guess, you're a spy
8 master. You are the one that actually
9 handles the other country's spies and you
10 handle commanders, insurgency. You're
11 basically James Bond.

12 That was me trying to tell
13 the jury what the case officer is as
14 opposed to intel analyst. I did not
15 compare myself to James Bond.

16 Q. All right.

17 MR. HAEFELE: Can we look at
18 6B, which is -- the next item is
19 your testimony in U.S. versus Adam
20 Shafi, from September 4, 2018,
21 which is only a short period after
22 your April 2018 testimony in
23 Jumaev.

24 - - -

6 — — — —

7 BY MR. HAEFELE:

8 Q. And in the Shafi case, if we
9 look at Page -- PDF Page 91 of the
10 transcript, and looking at Lines 4 to 9.

Again, you're telling the jury there that, I was a case officer.

15 A case officer is your
16 operative. I've always been a
17 practitioner, whether physician or case
18 officer. It's really the fellow who
19 handles spies, who runs wars. It's stuff
20 on James Bond, basically.

21 And is it your testimony,
22 then, that you don't think that somebody
23 who heard you say those things would say
24 that you were comparing yourself, as a

1 case officer, as someone who is like
2 James Bond?

3 MR. GOETZ: Objection to
4 form. Foundation.

5 THE WITNESS: You know, I
6 don't know how other people
7 interpret that. I did not compare
8 myself to James Bond.

9 This is something I'm trying
10 to tell the jury, using references
11 that the jury would understand.

12 BY MR. HAEFELE:

13 Q. All right.

14 A. And -- but I do not compare
15 myself very clearly here to either James
16 Bond. I'm trying to explain to the jury
17 what a case officer does as opposed to
18 somebody who writes or analyzes
19 intelligence behind a desk.

20 I'm a practitioner. I
21 always was.

22 Q. All right. But you're
23 pretty consistently telling the folks
24 that you're testifying to that you were a

1 case officer, and a case officer is
2 somebody who does James Bond stuff,
3 right?

4 MR. GOETZ: Objection.

5 Form.

6 THE WITNESS: If you want to
7 interpret it that way, fine. But
8 that's not what I said. I tried
9 to show that an operative is what
10 people show in James Bond movies.

11 BY MR. HAEFELE:

12 Q. You don't drive an Aston
13 Martin, right?

14 MR. GOETZ: Objection to
15 form.

16 BY MR. HAEFELE:

17 Q. You never did?

18 A. I wish I did. I wish I did.

19 Q. Yeah. What do you drink?
20 Martinis?

21 MR. GOETZ: Objection.

22 BY MR. HAEFELE:

23 Q. Do you really think that
24 telling people in testimony that you are

1 like James Bond is describing the
2 everyday, average, ordinary work that a
3 CIA case officer does, or is it something
4 that you're -- a different vision of what
5 a CIA case officer does that you're
6 trying to impose on the people listening
7 to you --

8 MR. GOETZ: Objection.

9 Argumentative. Repetitive. Let's
10 move on.

11 MR. HAEFELE: You need to
12 wait for me to finish my question.

13 BY MR. HAEFELE:

14 Q. Dr. Sageman, you can answer
15 the question.

16 A. It's not what I said.

17 Q. All right.

18 MR. HAEFELE: Can we put up
19 6C?

20 - - -

21 (Whereupon, Exhibit
22 Sageman-861, No Bates, Volume 11A,
23 Transcript of Proceedings, was
24 marked for identification.)

1

- - -

2 MR. HAEFELE: Just, I guess
3 to be clear for the record, that
4 the testimony from the Shafi case,
5 I think it was, is 860.

6

- - -

7 (Whereupon, a discussion off
8 the record occurred.)

9

- - -

10 MR. HAEFELE: This is a
11 third case, U.S. versus Jones and
12 Schimenti.

13 BY MR. HAEFELE:

14 Q. And Exhibit-861, which is on
15 the screen now, it's a case called U.S.
16 versus Jones and Schimenti.

17 Do you remember testifying
18 there?

19 A. Yes.

20 Q. And that was in July of
21 2019, which was only a few months after
22 the September 2018 testimony in Shafi,
23 correct?

24 A. Yes.

1 MR. HAEFELE: And if we can
2 go to Page 91 of the PDF, Lines 11
3 through 15. We aren't on the
4 right page, that's for sure. It
5 should be PDF Page 91 and 11
6 through 15.

7 MR. KNOWLES: This is 91 of
8 328. 055 of the original.

9 MR. HAEFELE: Is the case
10 Jones and Schimenti? Hang on.

11 MR. KNOWLES: Yes, sir.

12 MR. HAEFELE: All right.
13 Hang on.

14 Let's go back to that Page
15 91, 11 to 15. Wait. Hang on.
16 That's the page?

17 MR. KNOWLES: Yes, sir.

18 MR. HAEFELE: All right.

19 Can we go up to -- I'm not seeing
20 it because Dr. Sageman's face is
21 over top of it. Not your fault.
22 Mine.

23 All right. Page 91, Lines 3
24 to 9.

1 BY MR. HAEFELE:

2 Q. And you describe yourself as
3 a case officer, correct?

4 Yes.

5 Now, before becoming a case
6 officer, do you need special training?

7 Answer: Yes. I spent a
8 year at The Farm training to be a spy
9 master. A case officer is a spy master,
10 what people think as spy masters.

11 Is that the way you see
12 yourself?

13 A. I think that you don't know
14 what the definition of spy master is.
15 Spies are traitors to their own country.
16 Spy master is the person who handles a
17 spy.

18 A spy master is not a
19 traitor to his country. He's actually a
20 patriotic person who serves his country.
21 That's what spy masters are. They are
22 not spies. And they are spy handlers.

23 But people don't really know
24 exactly what spy handler is.

1 Q. Now --

2 A. Spy master is usually

3 what --

4 Q. Now --

5 A. -- how people refer to
6 themselves -- a case officer refer to
7 themselves when they explain what they
8 do, since people don't understand what a
9 case officer is.

10 Q. But now I'm even more
11 confused. Because you said you were a
12 case officer, as a spy master, and as a
13 case officer, you described yourself
14 doing James Bond stuff; but James Bond
15 was clearly a spy. I mean, that's --

16 A. No, he's a spy handler.

17 He's not a spy. A spy is a person who
18 betrays his own country. That's a spy.
19 We put spies in prison. We don't put
20 case officers who handle spies in prison.

21 Q. Okay.

22 A. I'm sorry for your
23 confusion.

24 Q. You watch James Bond movies

1 differently than I do, apparently.

2 Let me ask you directly,

3 then, since it seems to be unclear from

4 the various testimonies where you've

5 talked about a case officer being a spy

6 master and doing James Bond stuff and

7 that you were a case officer, but you're

8 not telling us, according to what you're

9 saying today, that you were a James

10 Bond-like person.

11 Do you believe that you

12 would categorize who you are and what you

13 did as doing James Bond stuff, as a spy

14 master?

15 MR. GOETZ: Objection.

16 Form. Scope. Repetitive.

17 Argumentative.

18 THE WITNESS: I, when I

19 speak to other people of my

20 profession, say that I'm a case

21 officer, people understand that.

22 Unfortunately, outside the

23 intelligence business, people do

24 not understand what a case officer

1 is. And so what we do is that we
2 distinguish between spies, who are
3 traitors to their own countries,
4 they betray their own country,
5 they give secrets to their
6 handlers, to their spy masters,
7 who are patriotic members of the
8 intelligence community serving
9 their own country. Spy masters
10 are decorated. Spies are shunned.
11 It's very different.

12 BY MR. HAEFELE:

13 Q. On the first page of your
14 report, you state that you have reviewed
15 the complete discovery material produced
16 by all seven sets of plaintiffs, as well
17 as the World Assembly of Muslim Youth
18 that you have -- that you have sent me --
19 and I think you're referring to what Mr.
20 Mohammedi has sent you -- on a hard
21 drive, which total more than hundreds of
22 thousands of pages.

23 And then you say, These
24 documents are too numerous to list.

1 MR. HAEFELE: Maybe we can
2 pull up -- we can pull up the
3 report, and you can find that text
4 there.

5 BY MR. HAEFELE:

6 Q. You have the report in front
7 of you?

8 A. I have the report in front
9 of me.

10 Q. Okay.

11 MR. GOETZ: We've been going
12 for over an hour and-a-half, so
13 when we get to a good point to
14 take a stretch break, that would
15 be great.

19 BY MR. HAEFFLE:

20 Q. The hard drive that was sent
21 to you by Mr. Mohammedi, the lawyer for
22 WAMY, that's who it came from, right?

23 A. Yes.

24 O. And do you still have that

1 assuming that I relied
2 exclusively, it seems, on Dr.
3 Noorwali's declaration. I did
4 not. I keep on telling you, I
5 used other contemporaneous primary
6 evidence for these.

7 BY MR. HAEFELE:

8 Q. You still didn't answer my
9 question, though.

10 A. I was about to. You just
11 interrupted me. You just interrupted me,
12 okay.

13 Q. Sir, you keep deflecting
14 from the answer, which is --

15 A. No, I'm not. I'm going to
16 answer your question.

17 Q. Answer my question and not
18 deflect. Answer the question that I
19 asked, don't deflect.

20 MR. GOETZ: Let him answer
21 the question.

22 MR. HAEFELE: I do want him
23 to answer the question, Fred. I
24 don't want him to use his CIA

1 tactics of deflection on me.

2 MR. GOETZ: You would have
3 had your answer by now if you
4 would just let him answer.

5 BY MR. HAEFELE:

6 Q. Answer the question and stop
7 deflecting, Mr. Sageman.

8 MR. GOETZ: And stop making
9 pontificating statements, Robert.

10 MR. MOHAMMEDI: You're
11 harassing the witness. You're
12 harassing the witness. And if
13 you're going to continue this, I'm
14 going to stop this deposition.

15 MR. HAEFELE: I want
16 answers --

17 MR. MOHAMMEDI: We are going
18 to stop this deposition if you
19 keep harassing the witness.

20 BY MR. HAEFELE:

21 Q. Dr. Sageman, please answer
22 the question.

23 A. As I said, the predicate of
24 your question is wrong. I did not rely

1 solely on Dr. Noorwali's deposition.

2 Q. That wasn't the predicate of
3 my question.

4 A. Yes, it was. Yes, it was.

5 That was the first sentence. Read it
6 again. Read it again. I specifically
7 listened to it.

8 Q. Dr. Sageman, let me ask you
9 this -- I know that you want to think
10 that your psychological background, your
11 psychology, can get into my mind. But
12 you don't know the predicate to my
13 question.

14 I didn't say -- I never said
15 you relied on only. The word "only" was
16 not in there. That's something that
17 you've inserted in there and you're
18 trying to deflect.

19 I have simply asked you when
20 you relied upon it -- and we have
21 established that you did rely on it --
22 when you relied upon it, did you do any
23 investigation, before you relied upon a
24 source, to determine whether that source

1 had a deep dislike for the United States?

2 MR. GOETZ: Objection.

3 Robert, your statements are
4 completely inappropriate. Ask him
5 questions, and he'll answer.

6 MR. HAEFELE: There's a
7 question pending.

8 THE WITNESS: I keep on
9 always answering saying I
10 partially relied on Dr. Noorwali's
11 two statements.

12 I would have -- when I look
13 at a person's statement, I look at
14 what that person is like at the
15 time of the statement.

16 The statement happened in
17 2019. This is 2006. There are a
18 lot of things that happened in 13
19 years. I don't know if his belief
20 or his feelings towards the United
21 States is similar to what he felt.
22 I mean, there's lot of things
23 happening in 13 years.

24 BY MR. HAEFELE: